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Attorneys for Petitioners
National Union Fire Insurance Company of Pittsburgh, Pa.
and American International South Insurance Company

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA. and
AMERICAN INTERNATIONAL SOUTH
INSURANCE COMPANY,

Petitioners,

- against -

THE UNITED COMPANY,

Respondent.

Case No. 08-CV-3147 (MGC)

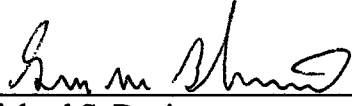
NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Petition to Compel Arbitration and the exhibits thereto, the accompanying memorandum of law; the undersigned attorneys for Petitioners National Union Fire Insurance Company of Pittsburgh, Pa. and American International South Insurance Company (collectively, the "AIG Companies"), will move this Court, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order compelling The United Company ("Respondent") to arbitrate its dispute with the AIG Companies, and granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's instructions any written opposition shall be served by April 4, 2008 and the Motion will be heard on April 8, 2008 at 2:30 p.m. before the Honorable Judge Miriam Cedarbaum in Courtroom 14A.

Dated: New York, New York
March 28, 2008

ZEICHNER ELLMAN & KRAUSE LLP

By: 
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AFFIDAVIT OF SERVICE
BY HAND DELIVERY

STATE OF NEW YORK,
COUNTY OF NEW YORK

Anthony Rosario, being duly sworn, deposes and says: that I am over the age of eighteen years, am not a party herein, and reside in Bronx County, New York and that on the 28th day of March, 2008 at approximately 3:15 p.m., I served a true copy of the within **NOTICE OF MOTION, SUMMONS AND PETITION TO COMPEL ARBITRATION WITH EXHIBITS AND MEMORANDUM OF LAW IN SUPPORT** upon the attorneys hereinafter named at the place hereinafter stated and set opposite their respective names by hand delivering the same to said attorneys at its last known address given below:

John G. Nevius, Esq., P.E.
Greg Hansen, Esq.
Anderson, Kill & Olick, P.C.
Attorneys for Respondent
The United Company
1251 Avenue of the Americas
New York, New York 10020


ANTHONY ROSARIO

Sworn to before me this
28 day of March, 2008.


NOTARY PUBLIC

MICHAEL W. ANTONIVICH
Notary Public, State of New York
No. 01AN4762190
Qualified in Nassau County
Commission Expires June 30, 2010